

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
U.S. OFFICE

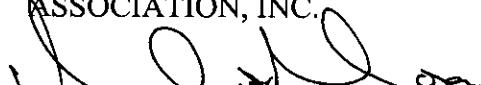
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CIVIL ACTION NO. 03-CV-30219-MAD

v.)	MOTION TO AMEND COMPLAINT
SPRINGFIELD LIBRARY AND MUSEUM ASSOCIATION, INC., Plaintiff)	
KNOEDLER ARCHIVUM, INC. f/k/a M. KNOEDLER & COMPANY, INC., Defendant)	

NOW COMES PLAINTIFF, Springfield Library And Museum Association, Inc. (hereinafter the "Springfield Museums") in the above-referenced matter, and respectfully requests this Court grant leave to file its Second Amended Complaint. A copy of Plaintiff's proposed Second Amended Complaint is filed herewith. In support thereof, the Springfield Museums attaches its Memorandum of Law and states that its proposed Second Amended Complaint sets forth supplemental factual detail in support of the Springfield Museums' claims against Knoedler Archivum, Inc.

WHEREFORE, the Springfield Museums requests this court grant its Motion to Amend Complaint.

SPRINGFIELD LIBRARY AND MUSEUMS
ASSOCIATION, INC.



MARK D MASON, ESQUIRE
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Springfield, MA 01103
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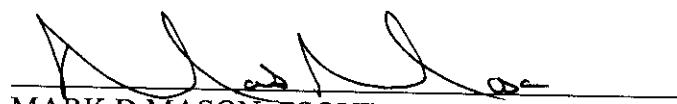
Dated: October 16, 2003

REQUEST FOR ORAL ARGUMENT

The Springfield Library and Museum Association, Inc. requests Oral Argument on its within Motion.

RULE 7.1(A)(2) CERTIFICATION

I, MARK D. MASON, Esquire, do hereby certify that I have conferred with counsel for Knoedler Archivum, Inc., Kenneth W. Salinger, Esq., prior to filing the within Motion in a good faith effort to resolve the within issue.



MARK D MASON, ESQUIRE

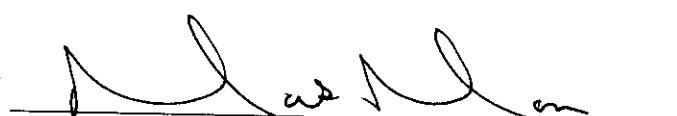
Certificate of Service

I, Mark D. Mason, Attorney for the Plaintiff, do hereby certify that I have this date served or caused to be served upon Defendant a copy of Plaintiff's Motion to Amend Complaint by mailing the same, postage prepaid first class mail, as follows:

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MARK D MASON, ESQUIRE

Dated: October 16, 2003